

**Document Management System – Enterprise Correspondence Management Module  
(DMS – ECMM)**

**USDA PRIVACY IMPACT ASSESSMENT FORM**

**Project Name:** Enterprise Correspondence Management Module – (ECMM)

**Description of Enterprise Correspondence Management Module:**

Enterprise Correspondence Management Module (CMM) is an application component of the USDA Document Management System (DMS). The system is designed to track incoming correspondence from public, private, or political inquiries. There will be approximately 60 system users who will be authenticated through the USDA Intranet for the Phase 1 rollout.

This application was created using JAVA and FileNet Content Manager and Business Process Manager. The initial rollout will be September 2004 and the Phase 2 rollout will be January 2005.

**DATA IN THE SYSTEM (Cont.)**

1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other. (Cont.)	DMS – ECMM tracks correspondence inquires from the public, private and political sectors from the beginning of the inquiry up to and including its resolution and response back to the originator.
2a. What are the sources of the information in the system?	The inquiries begin with an input (probably printed letter format) which is directly to a USDA Agency. The inquiry is then sent electronically throughout the appropriate USDA Agency until resolution is determined and a response is sent back to the originator of the inquiry.
2b. What USDA files and databases are used? What is the source agency?	Content Manager/BPM Server (SQL Server) and the FileNet WebServices Server in the Web Farm.
2c. What Federal Agencies are providing data for use in the system?	Potentially all USDA agencies. Phase 1 rollout will be for OES, OBPA and OGC. Phase 2 rollout users have not been determined yet.
2d. What State and Local Agencies are providing data for use in the system?	No state or local agencies provide data.
2e. From what other third party sources will data be collected?	The only third party data will be the originating inquiry from the public, private or political sectors.
2f. What information will be collected from the customer/employee?	Privacy Act protected information to include (but not limited to): SSN, Taxpayer Identification (ID) Numbers, debt payment information, addresses, etc.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	The inquiry and correspondence tracking system will provide constant updates and review of applicable data by USDA personnel.
3b. How will data be checked for completeness?	See 3a.

## ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	DMS – ECMM system users and managers and DMS – ECMM Systems Administrators.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	DMS – ECMM access is controlled by EAuthorization and roles determined by the data administrators.
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	No, users do not have access to ALL DATA on the system. Users are uniquely identified with a user ID. The system maintains the identity of the user and links allowable actions to specific users. The maintenance of user ID's will be accomplished using the administrative function. Privileges granted are based on job functions and area of authority.
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	DMS – ECMM log files are also created which include transaction history and an event file.  Audit trails are designed and implemented to record appropriate information that can assist in intrusion detection. The audit trails include sufficient information to determine the type of event, when it occurred, the user ID associated with the event, and the command/program used to initiate the event. Access to these logs is restricted to the system administrators.
5a. Do other systems share data or have access to data in this system? If yes, explain.	DMS – ECMM is accessible only by authorized users on the USDA Intranet. There is no direct access to data from system to system. Files are sent back and forth through servers in the Web Farm.
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	Kathy Anderson Project Manager Rural Development 1520 Market Street St. Louis, Missouri 63103 Phone Number: 314-335-8646 E-mail: <a href="mailto:ka143@stl.rural.usda.gov">ka143@stl.rural.usda.gov</a>
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	No other agencies share data or have direct access to data in this system other than USDA Agencies.
6b. How will the data be used by the agency?	DMS – ECMM provides a complete correspondence tracking systems for inquiries from the public, private and political sectors. Data will be used to track inquires and USDA staff responses.
6c. Who is responsible for assuring proper use of the data?	Kathy Anderson Project Manager Rural Development 1520 Market Street St. Louis, Missouri 63103 Phone Number: 314-335-8646 E-mail: <a href="mailto:ka143@stl.rural.usda.gov">ka143@stl.rural.usda.gov</a>

## ATTRIBUTES OF THE DATA

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes. The data attributes provide status of the inquiries and USDA staff responses.
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	The system takes a printed letter inquiry and digitizes it by use of a scanner. The scanned inquiry is then sent to the appropriate offices and tracked for location and response status. Supporting documents and responses are added to each inquiry's folder.
2b. Will the new data be placed in the individual's record (customer or employee)?	Yes, the data will be stored by inquiry record number.
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	No. The "System" does not make determinations but systems users input answers into the system for tracking.
2d. How will the new data be verified for relevance and accuracy?	The data will be verified through system screen edits and validations.
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	The data itself is not being consolidated.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	The data itself is not being consolidated.
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Data is retrieved by authorized CMM system users who update the information about the inquiry and forward to the next office.
4b. What are the potential effects on the due process rights of customers and employees of: consolidation and linkage of files and systems; derivation of data accelerated information processing and decision making; use of new technologies.	There are no effects on the due process rights.
4c. How are the effects to be mitigated?	There are no effects to mitigate.

## MAINTENANCE OF ADMINISTRATIVE CONTROLS

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	DMS – ECMM provides a complete correspondence tracking systems for inquiries from the public, private and political sectors. Data will be used to track inquires and USDA staff responses.
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	The system is hosted through the USDA Web Farm and the applications are restricted to authorized computers. Access is through USDA Intranet.
2b. Explain any possibility of disparate treatment of individuals or groups.	N/A
2c. What are the retention periods of data in this system?	Record management will be implemented at a future date.
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	FileNet Records Management software will be used.
2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	The system tracks the status and location of all external inquiries. The data is reviewed by USDA personnel for accuracy.
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	No, the system is not using technologies in ways that the USDA has not previously employed.
3b. How does the use of this technology affect customer/employee privacy?	To avoid costly retrofitting of safeguards, sensitivity was afforded importance early in the life cycle. The needs for information protection were established during the initiation, development, and operation phases, and will be afforded appropriate review when termination occurs. To ensure that adequate safeguards, alternatives, and rules are in place and implemented this system is reevaluated periodically.
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	No, this system is used to answer inquiries made on USDA and is not used to monitor individuals.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	No, this system is used to answer inquiries made on USDA and is not used to monitor Groups.

## MAINTENANCE OF ADMINISTRATIVE CONTROLS (Cont.)

<p>4c. What controls will be used to prevent unauthorized monitoring?</p>	<p>DMS – ECMM users interact with the system via the USDA Intranet on their desktop PC. DMS – ECMM server computers are Windows Based servers located within the secured WebFarm, behind a USDA firewall. Communication between user-activated browsers and the DMS – ECMM servers uses HTTP, the web protocol that communicates using TCP/IP, the Internet protocol, connecting to Internet Protocol (IP) ports reserved for web apps.</p> <p>Both the DMS – ECMM database server and the DMS – ECMM application servers are within the WebFarm firewall on a common subnet, simplifying security issues when DMS – ECMM applications access the database.</p>
<p>5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.</p>	<p>CMM Operates under SOR USDA/RURAL DEVELOPMENT RD -1 System name: Applicant, Borrower, Grantee, or Tenant File.</p>
<p>5b. If the system is being modified, will the SOR require amendment or revision? Explain.</p>	<p>A change control process is in place whereby all changes to application software are tested and user approved prior to being installed into production. Changes to the applications are controlled by specific written requests for automation. Test results are kept until the turnover release warranty is expired and used as reference if necessary. Emergency fixes are handled in the same way as more extensive fixes except that they take priority over all other activity. There are no “hot keys” activated to facilitate the correction of data.</p>